

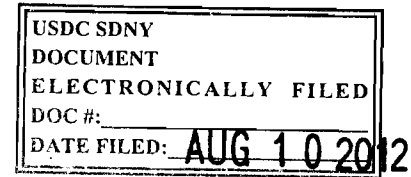
Federal Defenders OF NEW YORK, INC.

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August 9, 2012



By Facsimile

Honorable J. Paul Oetken
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
Fax: (212) 805-7991

**Re: United States v. Zenas Graham
11 Cr. 1059 (JPO)**

Dear Judge Oetken:

I write on consent (Assistant United States Attorney Christopher DiMase; Pretrial Services Officer Gianfranco Furelli) to respectfully request that the Court modify the conditions of Mr. Graham's release to allow him to go to an amusement park in Pennsylvania on Saturday, August 11, 2012.

Mr. Graham is charged in a one-count indictment with possessing with the intent to distribute a controlled substance in violation of Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(C). Mr. Graham's release conditions include a \$100,000 personal recognizance bond, co-signed by three financially responsible people; and curfew, enforced by electronic monitoring. Mr. Graham has been working regularly, and has been fully compliant with all the conditions of his release.

On Saturday, August 11, 2012, Mr. Graham's family and friends are chartering a bus to travel to the Dorney Amusement Park in Allentown Pennsylvania, departing from the Bronx at 8:00 a.m., and returning at around 1:30 a.m. on August 12, 2012.

I respectfully request that the Court modify the conditions of his release in two ways: first, extending the travel restrictions to allow Mr. Graham to travel to and from the Eastern District of Pennsylvania; and second, lifting the curfew such that Mr. Graham can return home on August 12, 2012 by 2:00 a.m.

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Thank you for your consideration of this request.

Respectfully Submitted,



Martin S. Cohen
Ass't Federal Defender
(Tel.) (212) 417-8737

cc. Christopher DiMase, Esq., by facsimile
Gianfranco Furelli, U.S. Pretrial Services Officer, by facsimile

APPLICATION GRANTED:


HON. J. PAUL OETKEN
UNITED STATES DISTRICT JUDGE

8-10-12